

Exhibit H

Jacquelyn Callanen

April 20, 2022

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO,)	
ET AL)	
vs.)	CASE NO. 5:21-CV-844-XR
GREGORY W. ABBOTT, ET AL)	
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OCA-GREATER HOUSTON, ET AL)	
vs.)	CASE NO. 1:23-CV-780-XR
JOHN SCOTT, ET AL)	
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HOUSTON JUSTICE, ET AL)	
vs.)	CASE NO. 5:21-CV-848-XR
GREGORY WAYNE ABBOTT, ET AL)	
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LULAC TEXAS, ET AL)	
vs.)	CASE NO. 1:21-CV-0786-XR
JOHN SCOTT, ET AL)	
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MIFAMILIA VOTA, ET AL)	
vs.)	CASE NO. 5:21-CV-0920-XR
GREG ABBOTT, ET AL)	
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UNITED STATES OF AMERICA)	
vs.)	CASE NO. 5:21-CV-1085-XR
THE STATE OF TEXAS, ET AL)	

ORAL VIDEOTAPED DEPOSITION

JACQUELYN CALLANEN

APRIL 20, 2022

1 ORAL VIDEOTAPED DEPOSITION OF JACQUELYN CALLANEN,
2 produced as a witness at the instance of the Plaintiffs
3 and duly sworn, was taken in the above-styled and
4 numbered cause on the 20TH day of April, 2022, from
5 9:27 a.m. to 7:07 p.m., before Sarah A. Prugh, Certified
6 Shorthand Reporter in and for the State of Texas,
7 reported by machine shorthand at the Offices of The
8 Mexican American Legal Defense and Educational Fund, 110
9 Broadway Street, Suite 300, San Antonio, Texas, pursuant
10 to the Federal Rules of Civil Procedure and the
11 provisions stated on the record or attached hereto.

1 A. Right, right.

2 Q. Because there is penalties with the poll
3 watchers.

4 A. Yes, ma'am.

5 Q. But just the general provisions having to do
6 with violating the election code, do you think it makes
7 it harder?

8 A. Yes, ma'am.

9 MS. HUNKER: Objection, form.

10 Q. (By Ms. Perales) Now, with poll watchers, have
11 you received any training from the secretary of state or
12 guidance about what it means for a poll worker to
13 obstruct the view of a poll watcher?

14 A. No. I mean other than that, that's -- again,
15 that has been standard for years because it has been sit
16 or stand to observe. And so we have always had that
17 where, you know, you can't go like this and cover the
18 computer screen or, you know, vice versa. So that
19 hasn't changed.

20 Q. So now that poll watchers have free movement
21 around the polling place, how would you advise a poll
22 worker of yours who says look, if a poll watcher is
23 standing nearby and I simply stand so that the voter
24 feels a greater sense of privacy, would you advise that
25 poll worker that it was okay to stand like that?

1 A. Yes, yes.

2 Q. Even if it was between the poll watcher and the
3 voter?

4 A. Yes.

5 Q. I am here for you, Jackie, if 8.01 comes into
6 effect.

7 A. Okay. I am going to hire you when I end up in
8 jail.

9 Q. We have to get Lisa's permission for that.

10 A. I will get you. I will have you on speed dial.

11 MS. HUNKER: No comment.

12 Q. (By Ms. Perales) Have you received any training
13 from the secretary of state about what is the distance
14 near enough for a poll watcher to be able to observe the
15 voting activity?

16 A. No. But you know, I hate when there is a butt.
17 But again, we are just coming out of this pandemic so
18 this has been tied to while we were in the pandemic.
19 And so everybody has that, you know, three feet,
20 six feet. We all still have the arrows and the marks on
21 the floor.

22 So for this first implementation, the
23 election officials wanted us to tell them that they had
24 to uphold, honor, whatever they word would be, the COVID
25 precautions. So we will have to look at this.